

PAMELA E. COGAN (SBN 105089)  
JENNIFER A. WILLIAMS (SBN 244707)  
ROPERS, MAJESKI, KOHN & BENTLEY  
1001 Marshall Street, Suite 300  
Redwood City, CA 94063-2052  
Telephone: (650) 364-8200  
Facsimile: (650) 780-1701  
Email: [pcogan@rmkb.com](mailto:pcogan@rmkb.com)  
[jwilliams@rmkb.com](mailto:jwilliams@rmkb.com)

Attorneys for Defendant  
LIBERTY MUTUAL FIRE INSURANCE  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**BZ**

R&L BROSAMER, INC.,

Plaintiff,

v.

LIBERTY MUTUAL FIRE INSURANCE  
COMPANY; AND DOES 1-15,

Defendant.

**CV 08**

**3607**

(Formerly Contra Costa County Superior Court  
Case No. C08-01605)

**DECLARATION OF JENNIFER A.  
WILLIAMS IN SUPPORT OF  
DEFENDANT LIBERTY MUTUAL FIRE  
INSURANCE COMPANY'S PETITION  
FOR REMOVAL**

I, JENNIFER A. WILLIAMS, declare:

1. I am an attorney at law licensed to practice before the courts of the State of California and the U.S. District Court for the Northern District of California, and an associate at the law firm of Ropers, Majeski, Kohn & Bentley, counsel of record for Defendant Liberty Mutual Fire Insurance Company ("Liberty Mutual"). The statements herein are of my own personal knowledge and if called as a witness, I could competently testify hereto.
2. On July 22, 2008, I sent a letter via facsimile and mail to plaintiff's counsel, Elisabeth A. Madden and Wallace M. Tice, asking them whether the amount in controversy exceeded \$75,000 and if it did, Liberty Mutual would be removing this action to federal court. If the amount in controversy did not exceed \$75,000, I asked counsel to sign an enclosed stipulation

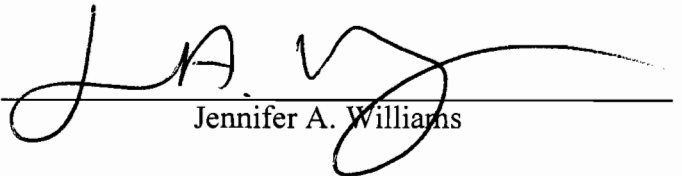
1 limiting the amount in controversy to \$75,000 and to return the stipulation to me by July 24,  
2 2008. Attached hereto as Exhibit A is a true and correct copy of my letter.

3 3. Today, plaintiff's counsel notified my office that it would not stipulate that the  
4 amount in controversy does not exceed \$75,000.

5 4. I verified with the California Secretary of State, Department of Corporations, via  
6 the Internet that R&L Brosamer is incorporated in California and has its principal place of  
7 business in California.

8 I declare under penalty of perjury under the laws of the United States that the foregoing is  
9 true and correct.

10 Executed this 28th day of July, 2008 at Redwood City, California.

11  
12  
13   
14 Jennifer A. Williams

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Redwood City



REDWOOD CITY | 1001 Marshall Street  
Los Angeles | Suite 300  
New York | Redwood City, CA 94063-2052  
San Francisco | Telephone (650) 364-8200  
San Jose | Facsimile (650) 780-1701  
Boston | www.rmkb.com



Jennifer A. Williams  
(650) 780-1719

jwilliams@rmkb.com

July 22, 2008

**U.S. Mail and Facsimile**

Elisabeth A. Madden  
Wallace M. Tice  
LYNCH, GILARDI & GRUMMER, APC  
475 Sansome St., #1800  
San Francisco, CA 94111

Re: R&L Brosamer v. Liberty Mutual Fire Insurance Co.  
Superior Court of California, County of Contra Costa Case No. C08-01605

Dear Ms. Madden and Mr. Tice:

Our firm has been retained to represent defendant Liberty Mutual Fire Insurance Company in the above-entitled action. Please confirm whether plaintiff is seeking in excess of \$75,000 in damages in this action. If not, we request that you please sign the enclosed stipulation to that effect. Otherwise, we will remove the action to Northern District Court.

Please let me know by July 24, 2008 whether plaintiff is seeking more than \$75,000 and, if not, whether you will agree to sign the stipulation. Should you have any questions please do not hesitate to contact me. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "J.A. Williams", with a long, sweeping horizontal line extending to the right.

Jennifer A. Williams

JAW/jaw

Enclosure

PAMELA E. COGAN (SBN 105089)  
JENNIFER A. WILLIAMS (SBN 244707)  
ROPER, MAJESKI, KOHN & BENTLEY  
1001 Marshall Street, Suite 300  
Redwood City, CA 94063-2052  
Telephone: (650) 364-8200  
Facsimile: (650) 780-1701  
Email: pcogan@rmkb.com  
jwilliams@rmkb.com

Attorneys for Defendant  
LIBERTY MUTUAL FIRE INSURANCE  
COMPANY

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF CONTRA COSTA

R&L BROSAMER, INC.,

Plaintiff,

v.

LIBERTY MUTUAL FIRE INSURANCE  
COMPANY; AND DOES 1-15,

Defendant.

CASE NO. C08-01605

**STIPULATION TO LIMIT AMOUNT IN  
CONTROVERSY**

Plaintiff R&L Brosamer, Inc., through its attorney of record, Elisabeth A. Madden and Wallace M. Tice of Lynch, Gilardi & Grummer, APC, and defendant Liberty Mutual Fire Insurance Company, through its attorney of record, Pamela E. Cogan and Jennifer A. Williams, of Ropers, Majeski, Kohn & Bentley HEREBY STIPULATE AS FOLLOWS:

In the present action, plaintiff is not now, nor will it at any time, in any court, seek to recover in excess of \$75,000 including special damages, economic damages, general damages, non-economic damages, costs of suit, attorney fees and punitive damages in connection with the subject matter of this litigation.

//

//

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Redwood City

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: July \_\_\_\_, 2008

LYNCH, GILARDI & GRUMMER, APC

By: \_\_\_\_\_  
ELISABETH A. MADDEN  
WALLACE M. TICE  
Attorneys for Plaintiff  
R&L BROSAMER, INC.

Dated: July \_\_\_\_, 2008

ROPERS, MAJESKI, KOHN & BENTLEY

By: \_\_\_\_\_  
PAMELA E. COGAN  
JENNIFER A. WILLIAMS  
Attorneys for Defendant  
LIBERTY MUTUAL FIRE INSURANCE  
COMPANY